

U.S. Department of Labor Occupational Safety and Health Administration
6393 Oak Tree Blvd
Suite 203
Independence, OH 44131



06/11/2019

Ohio Gratings, Inc.
5299 SOUTHWAY ST. SW
Canton, OH 44706

Dear Employer,

Enclosed you will find citations for violations of the Occupational Safety and Health Act of 1970 (the Act) which may have accompanying proposed penalties. Also enclosed is a booklet entitled, "Employer Rights and Responsibilities Following a Federal OSHA Inspection", (OSHA 3000-04R) revised 2018, which explains your rights and responsibilities under the Act. If you have any questions about the enclosed citations and penalties, I would welcome further discussions in person or by telephone. Please contact me at 216-447-4194.

You will note on page 2 of the booklet that, for violations which you do not contest, you must (1) notify this office promptly by letter that you have taken appropriate corrective action within the time set forth on the citation; and (2) pay any penalties assessed. Please inform me of the abatement steps you have taken and of their dates together with adequate supporting documentation; e.g., drawings or photographs of corrected conditions, purchase/work orders related to abatement actions, air sampling results. This information will allow us to close the case.

As indicated on page 3 of the booklet, you may request an informal conference with me during the 15-working-day notice of contest period. During such an informal conference you may present any evidence or views which you believe would support an adjustment to the citation or the penalty.

If you are considering a request for an informal conference to discuss any issues related to this Citation and Notification of Penalty, you must take care to schedule it early enough to allow time to contest after the informal conference, should you decide to do so. Please keep in mind that a written letter of intent to contest must be submitted to the Area Director within 15 working days of your receipt of the citation. The running of this contest period is not interrupted by an informal conference.

If you decide to request an informal conference, please complete the attached notice at the bottom of this letter and post it next to the Citations as soon as the time, date and the place of the informal conference have been determined. Be sure to bring to the conference with you any and all supporting documentation of existing conditions as well as of any abatement steps taken thus far. If conditions warrant, we can enter into an informal settlement agreement which amicably resolves this matter without litigation or contest.

You should be aware that OSHA publishes information on its inspection and citation activity on the Internet under the provisions of Electronic Freedom of Information Act. The information related to these alleged violations will be posted when our system indicates that you have received this citation. You are encouraged to review the information concerning your establishment at www.osha.gov. If you have any dispute with the accuracy of the information displayed, please contact this office.

Sincerely,

A handwritten signature in dark ink, appearing to read "H. B. Eberts", is written over the typed name and title.

Howard B. Eberts
Area Director

Enclosures

U.S. Department of Labor

Occupational Safety and Health Administration
6393 Oak Tree Blvd
Suite 203
Independence, OH 44131



Citation and Notification of Penalty

To:
Ohio Gratings, Inc.
and its successors
5299 SOUTHWAY ST. SW
Canton, OH 44706

Inspection Number: 1368252
Inspection Date(s): 12/27/2018 - 04/18/2019
Issuance Date: 06/11/2019

Inspection Site:
5299 SOUTHWAY ST. SW
Canton, OH 44706

The violation(s) described in this Citation and Notification of Penalty is (are) alleged to have occurred on or about the day(s) the inspection was made unless otherwise indicated within the description given below.

This Citation and Notification of Penalty (this Citation) describes violations of the Occupational Safety and Health Act of 1970. The penalty(ies) listed herein is (are) based on these violations. You must abate the violations referred to in this Citation by the dates listed and pay the penalties proposed, unless within 15 working days (excluding weekends and Federal holidays) from your receipt of this Citation and Notification of Penalty **you either call to schedule an informal conference (see paragraph below) or** you mail a notice of contest to the U.S. Department of Labor Area Office at the address shown above. Please refer to the enclosed booklet (OSHA 3000) which outlines your rights and responsibilities and which should be read in conjunction with this form. Issuance of this Citation does not constitute a finding that a violation of the Act has occurred unless there is a failure to contest as provided for in the Act or, if contested, unless this Citation is affirmed by the Review Commission or a court.

Posting - The law requires that a copy of this Citation and Notification of Penalty be posted immediately in a prominent place at or near the location of the violation(s) cited herein, or, if it is not practicable because of the nature of the employer's operations, where it will be readily observable by all affected employees. This Citation must remain posted until the violation(s) cited herein has (have) been abated, or for 3 working days (excluding weekends and Federal holidays), whichever is longer.

Informal Conference - An informal conference is not required. However, if you wish to have such a conference you may request one with the Area Director during the 15 working day contest period by calling 216-447-4194. During such an informal conference you may present any evidence or views which you believe would support an adjustment to the citation(s) and/or penalty(ies).

If you are considering a request for an informal conference to discuss any issues related to this Citation and Notification of Penalty, you must take care to schedule it early enough to allow time to contest after the informal conference, should you decide to do so. Please keep in mind that a written letter of intent to contest must be submitted to the Area Director within 15 working days of your receipt of this Citation. The running of this contest period is not interrupted by an informal conference.

If you decide to request an informal conference, please complete, remove and post the Notice to Employees next to this Citation and Notification of Penalty as soon as the time, date, and place of the informal conference have been determined. Be sure to bring to the conference any and all supporting documentation of existing conditions as well as any abatement steps taken thus far. If conditions warrant, we can enter into an informal settlement agreement which amicably resolves this matter without litigation or contest.

Right to Contest – You have the right to contest this Citation and Notification of Penalty. You may contest all citation items or only individual items. You may also contest proposed penalties and/or abatement dates without contesting the underlying violations. Unless you inform the Area Director in writing that you intend to contest the citation(s) and/or proposed penalty(ies) within 15 working days after receipt, the citation(s) and the proposed penalty(ies) will become a final order of the Occupational Safety and Health Review Commission and may not be reviewed by any court or agency.

Penalty Payment – Penalties are due within 15 working days of receipt of this notification unless contested. (See the enclosed booklet and the additional information provided related to the Debt Collection Act of 1982.) Make your check or money order payable to “DOL-OSHA”. Please indicate the Inspection Number on the remittance. You can also make your payment electronically on www.pay.gov. On the left side of the pay.gov homepage, you will see an option to Search Public Forms. Type “OSHA” and click Go. From the results, click on OSHA Penalty Payment Form. The direct link is:

<https://www.pay.gov/paygov/forms/formInstance.html?agencyFormId=53090334>.

You will be required to enter your inspection number when making the payment. Payments can be made by credit card or Automated Clearing House (ACH) using your banking information. Payments of \$25,000 or more require a Transaction ID, and also must be paid using ACH. If you require a Transaction ID, please contact the OSHA Debt Collection Team at (202) 693-2170.

OSHA does not agree to any restrictions or conditions or endorsements put on any check, money order, or electronic payment for less than the full amount due, and will process the payments as if these restrictions or conditions do not exist.

Notification of Corrective Action – For each violation which you do not contest, you must provide *abatement certification* to the Area Director of the OSHA office issuing the citation and identified above. This abatement certification is to be provided by letter within 10 calendar days after each abatement date. Abatement certification includes the date and method of abatement. If the citation indicates that the violation was corrected during the inspection, no abatement certification is required for that item. The abatement certification letter must be posted at the location where the violation appeared and the corrective action took place or employees must otherwise be effectively informed about abatement activities. A sample abatement certification letter is enclosed with this Citation. In addition, where the citation indicates that *abatement documentation* is necessary, evidence of the purchase or repair of equipment, photographs or video, receipts, training records, etc., verifying that abatement has occurred is required to be provided to the Area Director.

Employer Discrimination Unlawful – The law prohibits discrimination by an employer against an

employee for filing a complaint or for exercising any rights under this Act. An employee who believes that he/she has been discriminated against may file a complaint no later than 30 days after the discrimination occurred with the U.S. Department of Labor Area Office at the address shown above.

Employer Rights and Responsibilities – The enclosed booklet (OSHA 3000) outlines additional employer rights and responsibilities and should be read in conjunction with this notification.

Notice to Employees – The law gives an employee or his/her representative the opportunity to object to any abatement date set for a violation if he/she believes the date to be unreasonable. The contest must be mailed to the U.S. Department of Labor Area Office at the address shown above and postmarked within 15 working days (excluding weekends and Federal holidays) of the receipt by the employer of this Citation and Notification of Penalty.

Inspection Activity Data – You should be aware that OSHA publishes information on its inspection and citation activity on the Internet under the provisions of the Electronic Freedom of Information Act. The information related to these alleged violations will be posted when our system indicates that you have received this citation. You are encouraged to review the information concerning your establishment at www.osha.gov. If you have any dispute with the accuracy of the information displayed, please contact this office.



NOTICE TO EMPLOYEES OF INFORMAL CONFERENCE

An informal conference has been scheduled with OSHA to discuss the citation(s) issued on 06/11/2019. The conference will be held by telephone or at the OSHA office located at 6393

Oak Tree Blvd, Suite 203, Independence, OH 44131 on _____ at

_____. Employees and/or representatives of employees have a right to attend an informal conference.

CERTIFICATION OF CORRECTIVE ACTION WORKSHEET

Inspection Number: 1368252

Company Name: Ohio Gratings, Inc.
Inspection Site: 5299 SOUTHWAY ST. SW, Canton, OH 44706
Issuance Date: 06/11/2019

List the specific method of correction for each item on this citation in this package that does not read "Corrected During Inspection" and return to: **U.S. Department of Labor – Occupational Safety and Health Administration, 6393 Oak Tree Blvd, Suite 203, Independence, OH 44131**

Citation Number _____ and Item Number _____ was corrected on _____
By (Method of Abatement): _____

Citation Number _____ and Item Number _____ was corrected on _____
By (Method of Abatement): _____

Citation Number _____ and Item Number _____ was corrected on _____
By (Method of Abatement): _____

Citation Number _____ and Item Number _____ was corrected on _____
By (Method of Abatement): _____

Citation Number _____ and Item Number _____ was corrected on _____
By (Method of Abatement): _____

Citation Number _____ and Item Number _____ was corrected on _____
By (Method of Abatement): _____

I certify that the information contained in this document is accurate and that the affected employees and their representatives have been informed of the abatement.

Signature

Date

Typed or Printed Name

Title

NOTE: 29 USC 666(g) whoever knowingly makes any false statements, representation or certification in any application, record, plan or other documents filed or required to be maintained pursuant to the Act shall, upon conviction, be punished by a fine of not more than \$10,000 or by imprisonment of not more than 6 months or both.

POSTING: A copy of completed Corrective Action Worksheet should be posted for employee review

U.S. Department of Labor
Occupational Safety and Health Administration

Inspection Number: 1368252
Inspection Date(s): 12/27/2018 - 04/18/2019
Issuance Date: 06/11/2019



Citation and Notification of Penalty

Company Name: Ohio Gratings, Inc.
Inspection Site: 5299 SOUTHWAY ST. SW, Canton, OH 44706

Citation 1 Item 1 Type of Violation: **Serious**

29 CFR 1910.106(e)(2)(iv)(d): Flammable liquids were not drawn from or transferred into vessels, containers, or portable tanks within a building only through a closed piping system, from safety cans, by means of a device drawing through the top, or from a container or portable tanks by gravity through an approved self-closing valve:

On or about December 27, 2018, the employer failed to ensure that an approved self-closing valve was used when transferring Water Reducible Alkyd Dip Enamel, a Category 3 flammable liquid, from a plastic tote to a metal dip tank.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	07/01/2019
Proposed Penalty:	\$13260.00

See pages 1 through 4 of this Citation and Notification of Penalty for information on employer and employee rights and responsibilities.

U.S. Department of Labor
Occupational Safety and Health Administration

Inspection Number: 1368252
Inspection Date(s): 12/27/2018 - 04/18/2019
Issuance Date: 06/11/2019



Citation and Notification of Penalty

Company Name: Ohio Gratings, Inc.
Inspection Site: 5299 SOUTHWAY ST. SW, Canton, OH 44706

Citation 1 Item 2 Type of Violation: **Serious**

29 CFR 1910.124(f): Employees were not knowledgeable of the proper first-aid procedures appropriate to the dipping or coating hazards to which they were exposed:

On or about December 27, 2018, the employer failed to ensure that employees working with Water Reducible Alkyd Dip Enamel in a dip tank procedure were knowledgeable of proper first-aid procedures.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	07/01/2019
Proposed Penalty:	\$9472.00

See pages 1 through 4 of this Citation and Notification of Penalty for information on employer and employee rights and responsibilities.

U.S. Department of Labor
Occupational Safety and Health Administration

Inspection Number: 1368252
Inspection Date(s): 12/27/2018 - 04/18/2019
Issuance Date: 06/11/2019



Citation and Notification of Penalty

Company Name: Ohio Gratings, Inc.
Inspection Site: 5299 SOUTHWAY ST. SW, Canton, OH 44706

Citation 1 Item 3 Type of Violation: **Serious**

29 CFR 1910.124(g)(2): Employees who worked with liquids that could burn, irritate, or otherwise harm their skin were not provided with an emergency shower and eye-wash station close to the dipping and coating operation:

On or about December 27, 2018, the employer failed to ensure that employees who worked with liquids that could irritate their skin and eyes, including, but not limited to, Water Reducible Alkyd Dip Enamel, were provided with an emergency shower and eye-wash station close to the dipping operation.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	07/01/2019
Proposed Penalty:	\$9472.00

See pages 1 through 4 of this Citation and Notification of Penalty for information on employer and employee rights and responsibilities.

U.S. Department of Labor
Occupational Safety and Health Administration

Inspection Number: 1368252
Inspection Date(s): 12/27/2018 - 04/18/2019
Issuance Date: 06/11/2019



Citation and Notification of Penalty

Company Name: Ohio Gratings, Inc.
Inspection Site: 5299 SOUTHWAY ST. SW, Canton, OH 44706

Citation 1 Item 4 Type of Violation: **Serious**

29 CFR 1910.124(j)(3): Periodic inspections of all dipping and coating equipment, including covers, drains, overflow piping, and electrical and fire-extinguishing systems were not conducted, and deficiencies were not promptly corrected:

On or about December 27, 2018, the employer failed to ensure that periodic inspections of all dipping and coating equipment, including covers, drains, overflow piping, and electrical and fire-extinguishing systems were conducted. The dip tank operation was not equipped with required safety features including but not limited to, drains, overflow piping, and missing fire-extinguishing systems.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	07/01/2019
Proposed Penalty:	\$13260.00

See pages 1 through 4 of this Citation and Notification of Penalty for information on employer and employee rights and responsibilities.

U.S. Department of Labor
Occupational Safety and Health Administration

Inspection Number: 1368252
Inspection Date(s): 12/27/2018 - 04/18/2019
Issuance Date: 06/11/2019



Citation and Notification of Penalty

Company Name: Ohio Gratings, Inc.
Inspection Site: 5299 SOUTHWAY ST. SW, Canton, OH 44706

Citation 1 Item 5 Type of Violation: **Serious**

29 CFR 1910.125(b)(1)(ii): Properly trapped overflow piping that discharged to a safe location was not provided for any dip tank having a liquid surface area greater than 10 feet squared (0.95 m²):

On or about December 27, 2018, the employer failed to provide overflow piping that discharged to a safe location for a dip tank having a surface area of approximately 139.5 square feet of Water Reducible Alkyd Dip Enamel, a Category 3 flammable liquid.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	07/01/2019
Proposed Penalty:	\$13260.00

See pages 1 through 4 of this Citation and Notification of Penalty for information on employer and employee rights and responsibilities.

U.S. Department of Labor
Occupational Safety and Health Administration

Inspection Number: 1368252
Inspection Date(s): 12/27/2018 - 04/18/2019
Issuance Date: 06/11/2019



Citation and Notification of Penalty

Company Name: Ohio Gratings, Inc.
Inspection Site: 5299 SOUTHWAY ST. SW, Canton, OH 44706

Citation 1 Item 6 Type of Violation: **Serious**

29 CFR 1910.125(c)(1): Dip tank containing more than 500 gallons (1893 L) of liquid was not equipped with a bottom drain:

On or about December 27, 2018, the employer failed to provide a dip tank containing more than 500 gallons of Water Reducible Alkyd Dip Enamel, a Category 3 flammable liquid, with a bottom drain which can be used to empty the tank during a fire.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	07/01/2019
Proposed Penalty:	\$13260.00

See pages 1 through 4 of this Citation and Notification of Penalty for information on employer and employee rights and responsibilities.

U.S. Department of Labor
Occupational Safety and Health Administration

Inspection Number: 1368252
Inspection Date(s): 12/27/2018 - 04/18/2019
Issuance Date: 06/11/2019



Citation and Notification of Penalty

Company Name: Ohio Gratings, Inc.
Inspection Site: 5299 SOUTHWAY ST. SW, Canton, OH 44706

Citation 1 Item 7 Type of Violation: **Serious**

29 CFR 1910.125(e)(2): Portable container(s) used to add liquid to the tank was not electrically bonded to the dip tank and was not positively grounded to prevent static electrical sparks or arcs:

On or about December 27, 2018, the employer failed to ensure that the portable container used to add Water Reducible Alkyd Dip Enamel, a Category 3 flammable liquid, to the dip tank was electrically bonded to the dip tank to electrostatic spark.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	07/01/2019
Proposed Penalty:	\$13260.00

See pages 1 through 4 of this Citation and Notification of Penalty for information on employer and employee rights and responsibilities.

U.S. Department of Labor
Occupational Safety and Health Administration

Inspection Number: 1368252
Inspection Date(s): 12/27/2018 - 04/18/2019
Issuance Date: 06/11/2019



Citation and Notification of Penalty

Company Name: Ohio Gratings, Inc.
Inspection Site: 5299 SOUTHWAY ST. SW, Canton, OH 44706

Citation 1 Item 8 Type of Violation: **Serious**

29 CFR 1910.125(e)(4)(i): All vapor areas were not kept free of combustible debris and were not kept as free as practicable of combustible stock:

On or about December 27, 2018, the employer failed to keep the vapor area around the dip tank free of combustible debris when large pieces of cardboard covered in the Water Reducible Alkyd Dip Enamel were kept on the floor surrounding the dip tank.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	07/01/2019
Proposed Penalty:	\$13260.00

See pages 1 through 4 of this Citation and Notification of Penalty for information on employer and employee rights and responsibilities.

U.S. Department of Labor
Occupational Safety and Health Administration

Inspection Number: 1368252
Inspection Date(s): 12/27/2018 - 04/18/2019
Issuance Date: 06/11/2019



Citation and Notification of Penalty

Company Name: Ohio Gratings, Inc.
Inspection Site: 5299 SOUTHWAY ST. SW, Canton, OH 44706

Citation 1 Item 9 Type of Violation: **Serious**

29 CFR 1910.125(f)(1): Fire protection required by 29 CFR 1910.125(f) for any dip tank having a capacity of at least 150 gallons (568 L) or a liquid surface area of at least 4 square feet (0.38 m²) was not provided:

On or about December 27, 2018, a dip tank having a surface area of approximately 139.5 square feet of Water Reducible Alkyd Dip Enamel, a Category 3 flammable liquid, was not provided with fire protection.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	07/01/2019
Proposed Penalty:	\$13260.00

See pages 1 through 4 of this Citation and Notification of Penalty for information on employer and employee rights and responsibilities.

U.S. Department of Labor
Occupational Safety and Health Administration

Inspection Number: 1368252
Inspection Date(s): 12/27/2018 - 04/18/2019
Issuance Date: 06/11/2019



Citation and Notification of Penalty

Company Name: Ohio Gratings, Inc.
Inspection Site: 5299 SOUTHWAY ST. SW, Canton, OH 44706

Citation 1 Item 10 Type of Violation: **Serious**

29 CFR 1910.133(a)(1): The employer did not ensure that each affected employee uses appropriate eye or face protection when exposed to eye or face hazards from flying particles, molten metal, liquid chemicals, acids or caustic liquids, chemical gases or vapors, or potentially injurious light radiation:

On or about December 27, 2018, the employer failed to ensure that employees operating the dip tank containing Water Reducible Alkyd Dip Enamel were using appropriate eye or face protection including, but not limited to, tightly sealed goggles.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	07/01/2019
Proposed Penalty:	\$13260.00

See pages 1 through 4 of this Citation and Notification of Penalty for information on employer and employee rights and responsibilities.

U.S. Department of Labor
Occupational Safety and Health Administration

Inspection Number: 1368252
Inspection Date(s): 12/27/2018 - 04/18/2019
Issuance Date: 06/11/2019



Citation and Notification of Penalty

Company Name: Ohio Gratings, Inc.
Inspection Site: 5299 SOUTHWAY ST. SW, Canton, OH 44706

Citation 1 Item 11 Type of Violation: **Serious**

29 CFR 1910.138(a): The employer did not select and require employee(s) to use appropriate hand protection when employees' hands were exposed to hazards such as those from skin absorption of harmful substances; severe cuts or lacerations; severe abrasion; punctures; chemical burns; thermal burns; and harmful temperature extremes:

On or about December 27, 2018, the employer did not require employees working with chemicals including, but not limited to Water Reducible Alkyd Dip Enamel, to wear chemical resistant gloves.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	07/01/2019
Proposed Penalty:	\$9472.00

See pages 1 through 4 of this Citation and Notification of Penalty for information on employer and employee rights and responsibilities.

U.S. Department of Labor
Occupational Safety and Health Administration

Inspection Number: 1368252
Inspection Date(s): 12/27/2018 - 04/18/2019
Issuance Date: 06/11/2019



Citation and Notification of Penalty

Company Name: Ohio Gratings, Inc.
Inspection Site: 5299 SOUTHWAY ST. SW, Canton, OH 44706

Citation 1 Item 12 Type of Violation: **Serious**

29 CFR 1910.178(l)(4)(iii): An evaluation of each powered industrial truck operator's performance was not being conducted at least once every three years:

On or about December 27, 2018, the employer failed to ensure that each powered industrial truck operator who utilized a forklift to add Water Reducible Alkyd Dip Enamel, a Category 3 flammable liquid, to the dip tank was evaluated at least every 3 years.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:
Proposed Penalty:

07/01/2019
\$7577.00

See pages 1 through 4 of this Citation and Notification of Penalty for information on employer and employee rights and responsibilities.

U.S. Department of Labor
Occupational Safety and Health Administration

Inspection Number: 1368252
Inspection Date(s): 12/27/2018 - 04/18/2019
Issuance Date: 06/11/2019



Citation and Notification of Penalty

Company Name: Ohio Gratings, Inc.
Inspection Site: 5299 SOUTHWAY ST. SW, Canton, OH 44706

Citation 1 Item 13 Type of Violation: **Serious**

29 CFR 1910.215(a)(1): Abrasive wheel(s) used on grinding machinery were not used with safety guard(s):

On or about December 27, 2018, the employer failed to ensure that a safety guard was installed on the abrasive wheel of the surface grinder located on the back wall in the machine shop area.

Date By Which Violation Must be Abated:
Proposed Penalty:

Corrected During Inspection
\$13260.00

See pages 1 through 4 of this Citation and Notification of Penalty for information on employer and employee rights and responsibilities.



Citation and Notification of Penalty

Company Name: Ohio Gratings, Inc.
Inspection Site: 5299 SOUTHWAY ST. SW, Canton, OH 44706

The alleged violations below have been grouped because they involve similar or related hazards that may increase the potential for injury or illness.

Citation 1 Item 14 a Type of Violation: **Serious**

29 CFR 1910.1200(e)(1)(i): The employer did not compile a list of the hazardous chemicals known to be present using a product identifier that was referenced on the appropriate safety data sheet:

On or about December 27, 2018, the employer did not compile a list of the hazardous chemicals known to be present using a product identifier that was referenced on the appropriate safety data sheet for chemicals including, but not limited to, the Water Reducible Alkyd Dip Enamel, a Category 3 flammable liquid.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	07/01/2019
Proposed Penalty:	\$13260.00



Citation and Notification of Penalty

Company Name: Ohio Gratings, Inc.
Inspection Site: 5299 SOUTHWAY ST. SW, Canton, OH 44706

Citation 1 Item 14 b Type of Violation: **Serious**

29 CFR 1910.1200(g)(8): The employer did not maintain in the workplace copies of the required safety data sheets for each hazardous chemical, and did not ensure that they were readily accessible during each work shift to employees when they were in their work area(s):

On or about December 27, 2018, the employer failed to maintain in the workplace copies of the required data sheets for each hazardous chemical and failed to ensure that they were readily accessible during each work shift to employees when they were in their work areas. The books of safety data sheets were kept on-site in one area of one building and did not contain safety data sheets for all chemicals used in the facility.

- a. Employees were required to ask managers for access to the SDSs not available in these books. Employees are exposed to chemicals including, but not limited to, Water Reducible Alkyd Dip Enamel, a category 3 flammable liquid, when operating the dip tank.
- b. Employees were required to ask managers for access to the SDSs not available in these books. Employees are exposed to chemicals including, but not limited to, Trim Sol metal working fluid when operating surface grinders and CNC machines in the machine shop department.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated: 07/01/2019

U.S. Department of Labor
Occupational Safety and Health Administration

Inspection Number: 1368252
Inspection Date(s): 12/27/2018 - 04/18/2019
Issuance Date: 06/11/2019



Citation and Notification of Penalty

Company Name: Ohio Gratings, Inc.
Inspection Site: 5299 SOUTHWAY ST. SW, Canton, OH 44706

The alleged violations below have been grouped because they involve similar or related hazards that may increase the potential for injury or illness.

Citation 1 Item 15 a Type of Violation: **Serious**

29 CFR 1910.1200(h)(3)(ii): Employee training did not include the physical and health hazards of the chemicals in the work area:

- a. On or about December 27, 2018, the employer failed to provide employees with effective training on the hazards associated with the chemicals in their work area including, but not limited to, Water Reducible Alkyd Dip Enamel, a Category 3 flammable liquid, at their time of initial assignment when working in the dip tank operation.
- b. On or about December 27, 2018, the employer failed to provide employees with effective training on the hazards associated with the chemicals in their work area including, but not limited to, Trim Sol metal working fluid, at the time of initial assignment when working in the machine shop.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	07/01/2019
Proposed Penalty:	\$13260.00

See pages 1 through 4 of this Citation and Notification of Penalty for information on employer and employee rights and responsibilities.

U.S. Department of Labor
Occupational Safety and Health Administration

Inspection Number: 1368252
Inspection Date(s): 12/27/2018 - 04/18/2019
Issuance Date: 06/11/2019



Citation and Notification of Penalty

Company Name: Ohio Gratings, Inc.
Inspection Site: 5299 SOUTHWAY ST. SW, Canton, OH 44706

Citation 1 Item 15 b Type of Violation: **Serious**

29 CFR 1910.1200(h)(3)(iv): Training provided by the employer did not include the details of the employer's hazard communication program, including an explanation of the labels received on shipped containers and the workplace labeling system used by their employer; the safety data sheet, including the order of information and how employees can obtain and use the appropriate hazard information.

On or about December 27, 2018, the employer failed to provide employees with effective training on the details of the hazard communication program including, but not limited to, how employees can obtain a safety data sheet.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated: 07/01/2019

U.S. Department of Labor
Occupational Safety and Health Administration

Inspection Number: 1368252
Inspection Date(s): 12/27/2018 - 04/18/2019
Issuance Date: 06/11/2019



Citation and Notification of Penalty

Company Name: Ohio Gratings, Inc.
Inspection Site: 5299 SOUTHWAY ST. SW, Canton, OH 44706

Citation 2 Item 1 Type of Violation: **Other-than-Serious**

29 CFR 1904.32(a)(3): The employer did not certify an OSHA 300A Form or equivalent:

On or about December 27, 2018, the employer failed to certify the OSHA 300A forms which present a summary of recordable injuries and illnesses that have occurred throughout the facility.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	07/01/2019
Proposed Penalty:	\$1895.00

See pages 1 through 4 of this Citation and Notification of Penalty for information on employer and employee rights and responsibilities.

U.S. Department of Labor
Occupational Safety and Health Administration

Inspection Number: 1368252
Inspection Date(s): 12/27/2018 - 04/18/2019
Issuance Date: 06/11/2019



Citation and Notification of Penalty

Company Name: Ohio Gratings, Inc.
Inspection Site: 5299 SOUTHWAY ST. SW, Canton, OH 44706

Citation 2 Item 2 Type of Violation: **Other-than-Serious**

29 CFR 1910.125(e)(5): A readily visible "No Smoking" sign was not posted near each dip tank:

On or about December 27, 2018, the employer failed to post a "No Smoking" sign near the dip tank containing a Category III flammable liquid.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	07/01/2019
Proposed Penalty:	\$0.00

See pages 1 through 4 of this Citation and Notification of Penalty for information on employer and employee rights and responsibilities.



Citation and Notification of Penalty

Company Name: Ohio Gratings, Inc.
Inspection Site: 5299 SOUTHWAY ST. SW, Canton, OH 44706

Citation 2 Item 3 Type of Violation: **Other-than-Serious**

29 CFR 1910.1200(f)(7): In lieu of affixing labels to individual stationary process containers, the employer did not ensure the written materials such as signs, placards, process sheets, batch tickets, or operating procedures, containing the information required by paragraph (f)(6) of this section to be on a label, were readily accessible to the employees in their work area throughout each work shift:

On or about December 27, 2018, the employer failed to ensure that the dip tank containing Water Reducible Alkyd Dip Enamel, a Category 3 flammable liquid, was labeled or that written materials contained the information required by paragraph f(6) of this section.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	07/01/2019
Proposed Penalty:	\$0.00

U.S. Department of Labor
Occupational Safety and Health Administration

Inspection Number: 1368252
Inspection Date(s): 12/27/2018 - 04/18/2019
Issuance Date: 06/11/2019



Citation and Notification of Penalty

Company Name: Ohio Gratings, Inc.
Inspection Site: 5299 SOUTHWAY ST. SW, Canton, OH 44706

Citation 2 Item 4 Type of Violation: **Other-than-Serious**

29 CFR 1910.132(d)(2): The employer did not verify, through a written certification, that the required workplace hazard assessment had been performed:

On or about December 27, 2018, the employer failed to certify in writing that an assessment of the workplace to determine if hazards are present which necessitate the use of personal protective equipment.

Date By Which Violation Must be Abated:
Proposed Penalty:

Corrected During Inspection
\$0.00

See pages 1 through 4 of this Citation and Notification of Penalty for information on employer and employee rights and responsibilities.



Citation and Notification of Penalty

Company Name: Ohio Gratings, Inc.
Inspection Site: 5299 SOUTHWAY ST. SW, Canton, OH 44706

Citation 2 Item 5 Type of Violation: **Other-than-Serious**

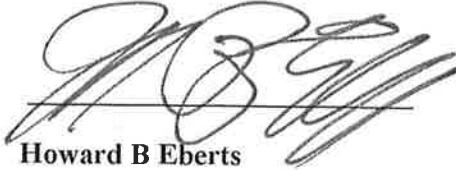
29 CFR 1910.134(k)(6): The employer did not provide the basic advisory information on respirators, as presented in Appendix D of 29 CFR 1910.134, in written or oral format to employees who wear respirators when such use was not required by the employer:

On or about December 27, 2018, the employer failed to provide the basic advisory information on respirators, as presented in Appendix D of 29 CFR 1910.134, in written or oral format to employees who wear respirators on a voluntary basis while operating the dip tank containing Water Reducible Alkyd Dip Enamel.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:
Proposed Penalty:

07/01/2019
\$0.00


Howard B Eberts
Area Director

U.S. Department of Labor
Occupational Safety and Health Administration
6393 Oak Tree Blvd
Suite 203
Independence, OH 44131



INVOICE / DEBT COLLECTION NOTICE

Company Name: Ohio Gratings, Inc.
Inspection Site: 5299 SOUTHWAY ST. SW, Canton, OH 44706
Issuance Date: 06/11/2019

Summary of Penalties for Inspection Number	1368252
Citation 1, Serious	\$181853.00
Citation 2, Other-than-Serious	\$1895.00
TOTAL PROPOSED PENALTIES	\$183748.00

To avoid additional charges, please remit payment promptly to this Area Office for the total amount of the uncontested penalties summarized above. Make your check or money order payable to: "DOL-OSHA". Please indicate OSHA's Inspection Number (indicated above) on the remittance. You can also make your payment electronically on www.pay.gov. On the left side of the pay.gov homepage, you will see an option to Search Public Forms. Type "OSHA" and click Go. From the results, click on **OSHA Penalty Payment Form**. The direct link is <https://www.pay.gov/paygov/forms/formInstance.html?agencyFormId=53090334>. You will be required to enter your inspection number when making the payment. Payments can be made by credit card or Automated Clearing House (ACH) using your banking information. Payments of \$25,000 or more require a Transaction ID, and also must be paid using ACH. If you require a Transaction ID, please contact the OSHA Debt Collection Team at (202) 693-2170.

OSHA does not agree to any restrictions or conditions or endorsements put on any check, money order, or electronic payment for less than the full amount due, and will cash the check or money order as if these restrictions or conditions do not exist.

If a personal check is issued, it will be converted into an electronic fund transfer (EFT). This means that our bank will copy your check and use the account information on it to electronically debit your account for the amount of the check. The debit from your account will then usually occur within 24 hours and will be shown on your regular account statement. You will not receive your original check back. The bank will destroy your original check, but will keep a copy of it. If the EFT cannot be completed because of insufficient funds or closed

account, the bank will attempt to make the transfer up to 2 times.

Pursuant to the Debt Collection Act of 1982 (Public Law 97-365) and regulations of the U.S. Department of Labor (29 CFR Part 20), the Occupational Safety and Health Administration is required to assess interest, delinquent charges, and administrative costs for the collection of delinquent penalty debts for violations of the Occupational Safety and Health Act.

Interest: Interest charges will be assessed at an annual rate determined by the Secretary of the Treasury on all penalty debt amounts not paid within one month (30 calendar days) of the date on which the debt amount becomes due and payable (penalty due date). The current interest rate is one percent (1%). Interest will accrue from the date on which the penalty amounts (as proposed or adjusted) become a final order of the Occupational Safety and Health Review Commission (that is, 15 working days from your receipt of the Citation and Notification of Penalty), unless you file a notice of contest. Interest charges will be waived if the full amount owed is paid within 30 calendar days of the final order.

Delinquent Charges: A debt is considered delinquent if it has not been paid within one month (30 calendar days) of the penalty due date or if a satisfactory payment arrangement has not been made. If the debt remains delinquent for more than 90 calendar days, a delinquent charge of six percent (6%) per annum will be assessed accruing from the date that the debt became delinquent.

Administrative Costs: Agencies of the Department of Labor are required to assess additional charges for the recovery of delinquent debts. These additional charges are administrative costs incurred by the Agency in its attempt to collect an unpaid debt. Administrative costs will be assessed for demand letters sent in an attempt to collect the unpaid debt.


Howard B Eberts

Area Director

6-11-2019
Date